

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC. ET AL.,

Plaintiffs,

v.

X CORP., D/B/A TWITTER,

Defendant.

Case No. 3:23-cv-00606
District Judge Aleta A. Trauger

**JOINT MOTION AND PROPOSED ORDER
TO STAY THE PROCEEDING**

Plaintiffs Concord Music Group, Inc., Universal Music Corp. d/b/a 360 Music, d/b/a Universal Music Works, Songs of Universal Inc. d/b/a Universal Music Works, d/b/a Universal Tunes, Universal Music – MGB NA LLC d/b/a Universal Music Careers, d/b/a Universal Music – MGB Songs, d/b/a Universal Music Rights, Polygram Publishing, Inc., Universal Music – Z Tunes LLC, d/b/a Universal Music – Z Songs, d/b/a Universal Music – Z Melodies, Universal Musica, Inc., d/b/a Universal Music Works, d/b/a Universal Musica Unica, ABKCO Music, Inc., Anthem Entertainment L.P., Big Machine Music, LLC, BMG Rights Management (US) LLC, Downtown Music Publishing, LLC, Hipgnosis Songs Group, LLC, Hipgnosis SFH I Limited, Big Family LLC, Kobalt Music Publishing America, Inc., Mayimba Music, Inc., J&N Publishing, LLC, Peer International Corporation, Peermusic, LTD., Peermusic III, LTD., Peertunes, LTD., Songs of Peer, LTD., Southern Music Publishing Co., Inc., Reservoir Media Management, Inc., Sony Music Publishing (US) LLC, Colgems-EMI Music Inc., EMI April Music Inc., EMI Blackwood Music Inc., EMI Consortium Music Publishing, Inc., EMI Consortium Songs, Inc. d/b/a EMI Longitude Music, EMI Entertainment World Inc. d/b/a EMI

Foray music, d/b/a EMI Pop Music Publishing, and d/b/a EMI Pop Music Publishing, Inc., EMI Feist Catalog Inc., EMI Mills Music Inc., EMI U Catalog Inc., Famous Music LLC, Jobete Music Co., Inc., Screen Gems-EMI Music Inc., Stone Agate Music, Stone Diamond Music Corp., Lyric Copyright Services, LP, The Royalty Network, Inc., Ultra International Music Publishing, LLC, Ultra Music Publishing Europe AG, Gene Autry's Western Music Publishing Co., Intersong U.S.A., Inc., Rick's Music, Inc., Unichappell Music Inc., W Chappell Music Corp. d/b/a WC Music Corp., W.C.M. Music Corp., Warner Chappell Music, Inc. d/b/a Chappell & Co., Inc. and d/b/a Warner Geometric Music, Warner-Tamerlane Publishing Corp., Wixen Music Publishing, Inc. (collectively "Plaintiffs") and Defendant X Corp. ("Defendant") (collectively, the "Parties") jointly request that the Court stay the proceeding for good cause.

The Parties have determined to engage in good-faith efforts to fully and amicably resolve this lawsuit. Granting a ninety (90) day stay may facilitate an orderly and negotiated resolution, and thus further the interest of judicial efficiency.

The Parties are approaching the end of a rigorous period of fact discovery, which is set to close on July 17, 2025. The Parties have engaged in extensive production of documents and other written discovery. There are numerous depositions to take place over the remainder of fact discovery, including in at least six different cities across the United States. With opening expert reports due on August 27, 2025, there is also substantial work to do with testifying experts. The foregoing activity, along with other expected and unexpected activity, including discovery disputes, would interfere with prospects of an amicable resolution to this litigation.

Accordingly, as set forth in the attached proposed Order, the Parties jointly request this proceeding be stayed for ninety (90) days from the date of entry of this Order, and that all deadlines in the case management order be adjourned by (90) days, to allow the Parties to explore a possible

resolution of this action. If the Parties resolve the action, they will promptly file an appropriate dismissal with the Court. If the discussions are not successful, the Parties shall notify the Court. If discussions are productive, but a resolution has not been reached within 90 days, the Parties may jointly request a further extension.

Dated: June 6, 2025,

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CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2025, I authorized the electronic filing of a true and exact copy of the foregoing with the Clerk of the Court using the CM/ECF system, which sent notice of such filing to counsel of record below:

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